

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SIXTH SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Companies= Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.
3. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
6. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

7. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

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Pursuant to 220 C.M.R. ' 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to NSTAR Electric the following information requests.

- DTE 6-01 Did the Companies consider the potential system benefits (e.g., deferred transmission and distribution investments) that DG installations may provide when designing their proposed standby rates? If not, why not?
- DTE 6-02 Please explain why NSTAR Electric believes that its proposed standby rates ensure that DG customers pay an appropriate share of distribution system costs.
- DTE 6-03 Refer to D.T.E. 98-100 (February 7, 2000) Final Guidelines at ' 3.3.2 (b) Avoided Transmission Costs and ' 3.3.2 (c) Avoided Distribution Costs. Please provide (a) the Companies=most current avoided transmission costs; (c) the Companies=most current avoided distribution costs; and (d) a brief narrative describing the method used to calculate these costs.
- DTE 6-04 Refer to Cambridge Electric Light Company, D.P.U. 94-101/95-36, at 50-52 (1995). In this Order, the Department denied Cambridge's proposal to apply charges to a customer's contracted demand and, instead, directed Cambridge to apply charges based on a customer's actual monthly demand. Please explain how NSTAR Electric's proposal in the instant proceeding to bill customers based on a contract demand is different from the proposal that was rejected by the Department in D.P.U. 94-101/95-36.
- DTE 6-05 Please provide a history of Cambridge's Standby Service Rate (SB-1).

Dated: March 5, 2004